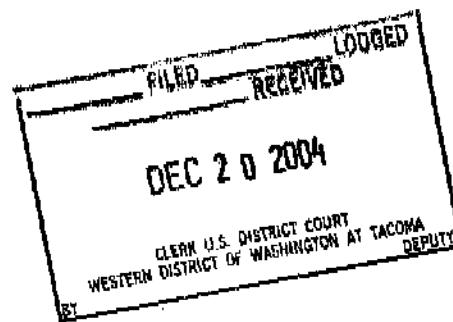




04-CV-05867-CMP



UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

ANTHONY P. KEYTER

Case No.

Plaintiff (Pro Se)

C04 586<sup>7</sup> RJB

Vs

) COMPLAINT IN CIVIL  
CLAIM FOR DAMAGES /  
ACTION TO COMPELL

230 GOVERNMENT OFFICERS

Defendants

(Names Listed in Section II.)

) - JURY DEMAND  
- DEMAND FOR EXTERNAL  
PANEL OF JUDGES

I. NATURE OF THE CASE

1. Plaintiff Anthony P. Keyter brings this civil action for damages against 230 officers of the Washington State and Federal governments, in their personal capacities. This claim arises from a conspiracy by the 230 officers to commit crimes, to obstruct the

1           administration of the laws, to defeat the ends of justice, to provide protection to  
2           criminals, and to deny the Plaintiff the right to protection of the laws and the rights to  
3           his lawful property. Each of these officers furthered the aims of that conspiracy.

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2. Each of the Defendants from whom damages is claimed, owed the Plaintiff a legal duty not to breach the laws of the United States and of Washington State and cause him harm. However, in malicious and reckless disregard for those legal duties towards the Plaintiff, each of the Defendants violated their duty and as a consequence caused the Plaintiff harm and loss. The breaches of law committed by the Defendants are serious in nature and include misprision of felony, conspiracy to commit crimes, and rendering criminal assistance. The Defendants all hold responsible positions in government and amongst them are senior members of society.
3. Through this civil claim restitution is sought for the harm and loss that the unbridled criminality and breaches of common law, committed by these government officers, have caused the Plaintiff.
4. Plaintiff petitions the Court to compel the Defendants by way of mandamus to obey the law, and to perform their respective duties pertaining to a large parcel of criminal allegations provided to each, which duties are circumscribed by the laws of Washington State and the United States.

II. PARTIES

**PLAINTIFF:**

Name of Plaintiff: Anthony P. Keyter  
Address: 6200 Soundview Dr. R201,  
Gig Harbor, WA. 98335  
Telephone: (253) 853 3859

1      **DEFENDANTS:**

2      **Washington State Executive:**

3      **Address: Washington State Capital, P.O. Box 40002, Olympia, WA. 98504**

4      1<sup>st</sup> Defendant: Gary Locke, Governor

5      2<sup>nd</sup> Defendant: Brad Owen, Lt. Governor

6      3<sup>rd</sup> Defendant: Sam Reed, Secretary of State

7      4<sup>th</sup> Defendant: Christine Gregoire, Attorney General

8      **Washington State Courts**

9      **Address: Temple of Justice, P.O. Box 40929, Olympia, WA. 98504**

10     5<sup>th</sup> Defendant: Gerry Alexander, Chief Justice

11     6<sup>th</sup> Defendant: Marywave Van Deren, Appeals Court Judge

12     7<sup>th</sup> Defendant: Deborah Fleck, Superior Court Judge

13     **Washington State Committee on Judicial Conduct**

14     **Address: P.O. Box 1817, Olympia, WA. 98507**

15     8<sup>th</sup> Defendant: Sherry Appleton

16     9<sup>th</sup> Defendant: Vivian Caver

17     10<sup>th</sup> Defendant: Marianne Connelly

18     11<sup>th</sup> Defendant: Gregory Dallaire

19     12<sup>th</sup> Defendant: Michael E. Donohue, Judge

20     13<sup>th</sup> Defendant: Margo Keller

21     14<sup>th</sup> Defendant: Connie Michener

22     15<sup>th</sup> Defendant: Ruth Reukauf, Judge

23     16<sup>th</sup> Defendant: John A. Schultheis, Judge

24     17<sup>th</sup> Defendant: K. Collins Sprague

25     18<sup>th</sup> Defendant: Todd K. Whitrock

26     19<sup>th</sup> Defendant: Mary Kay Becker, Judge

27     20<sup>th</sup> Defendant: John McCarthy, Judge

28     21<sup>st</sup> Defendant: Antonio Cube, Sr.

29     22<sup>nd</sup> Defendant: Joseph Delay

30     23<sup>rd</sup> Defendant: Judie Fortier

31     24<sup>th</sup> Defendant: Nora Gallaher

32     25<sup>th</sup> Defendant: Lorraine Lee

33     26<sup>th</sup> Defendant: Wanda Briggs

34     27<sup>th</sup> Defendant: Mike Sotelo

35     28<sup>th</sup> Defendant: Betsy Wilkerson

36     29<sup>th</sup> Defendant: Judge Clark

37     30<sup>th</sup> Defendant: David Akana

38     31<sup>st</sup> Defendant: Barrie Althof

1           **Senators - Washington State Senate**

2           **Address: Washington State Capital, P.O. Box 40600, Olympia, WA. 98504**

3           32<sup>nd</sup> Defendant: Don Benton

4           33<sup>rd</sup> Defendant: Dale Brandland

5           34<sup>th</sup> Defendant: Lisa Brown

6           35<sup>th</sup> Defendant: Don Carlson

7           36<sup>th</sup> Defendant: Alex Deccio

8           37<sup>th</sup> Defendant: Mark Doumit

9           38<sup>th</sup> Defendant: Tracey Eide

10          39<sup>th</sup> Defendant: Luke Esser

11          40<sup>th</sup> Defendant: Darlene Fairley

12          41<sup>st</sup> Defendant: Bill Finkbeiner

13          42<sup>nd</sup> Defendant: Rosa Franklin

14          43<sup>rd</sup> Defendant: Karen Fraser

15          44<sup>th</sup> Defendant: Patricia Hale

16          45<sup>th</sup> Defendant: Jim Hargrove

17          46<sup>th</sup> Defendant: Mary Margaret Haugen

18          47<sup>th</sup> Defendant: Mike Hewitt

19          48<sup>th</sup> Defendant: Jim Honeyford

20          49<sup>th</sup> Defendant: Jim Horn

21          50<sup>th</sup> Defendant: Ken Jacobsen

22          51<sup>st</sup> Defendant: Stephen Johnson

23          52<sup>nd</sup> Defendant: Jim Kastama

24          53<sup>rd</sup> Defendant: Karen Keiser

1           54<sup>th</sup> Defendant: Adam Kline

2           55<sup>th</sup> Defendant: Jeanne Kohl-Welles

3           56<sup>th</sup> Defendant: Rosemary McAuliffe

4           57<sup>th</sup> Defendant: Bob McCaslin

5           58<sup>th</sup> Defendant: Bob Morton

6           59<sup>th</sup> Defendant: Joyce Mullican

7           60<sup>th</sup> Defendant: Bob Oke

8           61<sup>st</sup> Defendant: Linda Evans Parlette

9           62<sup>nd</sup> Defendant: Erik Poulsen

10          63<sup>rd</sup> Defendant: Margarita Prentice

11          64<sup>th</sup> Defendant: Marilyn Rasmussen

12          65<sup>th</sup> Defendant: Aaron Reardon

13          66<sup>th</sup> Defendant: Debbie Regala

14          67<sup>th</sup> Defendant: Pam Roach

15          68<sup>th</sup> Defendant: Dino Rossi

16          69<sup>th</sup> Defendant: Dave Schmidt

17          70<sup>th</sup> Defendant: Larry Sheahan

18          71<sup>st</sup> Defendant: Betti Sheldon

19          72<sup>nd</sup> Defendant: Tim Sheldon

20          73<sup>rd</sup> Defendant: Paull Shin

1      74<sup>th</sup> Defendant: Harriet Spanel  
2      75<sup>th</sup> Defendant: Val Stevens  
3      76<sup>th</sup> Defendant: Dan Swecker  
4      77<sup>th</sup> Defendant: Pat Thibaudeau  
5      78<sup>th</sup> Defendant: James West  
6      79<sup>th</sup> Defendant: Shirley Winsley  
7      80<sup>th</sup> Defendant: Joseph Zarelli

5      **Representatives - Washington State House of Representatives**

6      **Address: Washington State Capital, P.O. Box 40600, Olympia, WA. 98504**

7      81<sup>st</sup> Defendant: John Ahern  
8      82<sup>nd</sup> Defendant: Gary Alexander  
9      83<sup>rd</sup> Defendant: Glenn Anderson  
10     84<sup>th</sup> Defendant: Mike Armstrong  
11     85<sup>th</sup> Defendant: Barbara Bailey  
12     86<sup>th</sup> Defendant: Brad Benson  
13     87<sup>th</sup> Defendant: Jean Berkey  
14     88<sup>th</sup> Defendant: Brian Blake  
15     89<sup>th</sup> Defendant: Marc Boldt  
16     90<sup>th</sup> Defendant: Jim Buck  
17     91<sup>st</sup> Defendant: Roger Bush  
18     92<sup>nd</sup> Defendant: Jack Cairnes  
19     93<sup>rd</sup> Defendant: Tom Campbell  
20     94<sup>th</sup> Defendant: Michael Carrell  
21     95<sup>th</sup> Defendant: Bruce Chandler  
22     96<sup>th</sup> Defendant: Maralyn Chase  
23     97<sup>th</sup> Defendant: Frank Chopp  
24     98<sup>th</sup> Defendant: Jim Clements  
1      99<sup>th</sup> Defendant: Judy Clibborn  
2      100<sup>th</sup> Defendant: Eileen Cody  
3      101<sup>st</sup> Defendant: Cary Condotta  
4      102<sup>nd</sup> Defendant: Steve Conway  
5      103<sup>rd</sup> Defendant: Mike Cooper  
6      104<sup>th</sup> Defendant: Don Cox  
7      105<sup>th</sup> Defendant: Larry Crouse  
8      106<sup>th</sup> Defendant: Jeannie Darneille  
9      107<sup>th</sup> Defendant: Richard DeBolt  
10     108<sup>th</sup> Defendant: Jerome Delvin  
11     109<sup>th</sup> Defendant: Mary Lou Dickerson  
12     110<sup>th</sup> Defendant: Hans Dunshee  
13     111<sup>th</sup> Defendant: Jeanne Edwards  
14     112<sup>th</sup> Defendant: William Eickmeyer  
15     113<sup>th</sup> Defendant: Doug Erickson  
16     114<sup>th</sup> Defendant: Dennis Flannigan  
17     115<sup>th</sup> Defendant: Bill Fromhold

1      116<sup>th</sup> Defendant: Jeff Gombosky  
2      117<sup>th</sup> Defendant: Bill Grant  
3      118<sup>th</sup> Defendant: Kathy Haigh  
4      119<sup>th</sup> Defendant: Shirley Hankins  
5      120<sup>th</sup> Defendant: Brian Hatfield  
6      121<sup>st</sup> Defendant: Bill Hinkle  
7      122<sup>nd</sup> Defendant: Janéa Holmquist  
8      123<sup>rd</sup> Defendant: Zack Hudgins  
9      124<sup>th</sup> Defendant: Sam Hunt  
10     125<sup>th</sup> Defendant: Ross Hunter  
11     126<sup>th</sup> Defendant: Fred Jarrett  
12     127<sup>th</sup> Defendant: Ruth Kagi  
13     128<sup>th</sup> Defendant: Phyllis Gutierrez Kenney  
14     129<sup>th</sup> Defendant: Lynn Kessler  
15     130<sup>th</sup> Defendant: Steve Kirby  
16     131<sup>st</sup> Defendant: Dan Kristiansen  
17     132<sup>nd</sup> Defendant: Patricia Lantz  
18     133<sup>rd</sup> Defendant: Kelli Linville  
19     134<sup>th</sup> Defendant: John Lovick  
20     135<sup>th</sup> Defendant: Dave Mastin  
21     136<sup>th</sup> Defendant: John McCoy  
22     137<sup>th</sup> Defendant: Joe McDermott  
23     138<sup>th</sup> Defendant: Joyce McDonald  
24     139<sup>th</sup> Defendant: Jim McIntire  
1      140<sup>th</sup> Defendant: Lois McMahan  
2      141<sup>st</sup> Defendant: Cathy McMorris  
3      142<sup>nd</sup> Defendant: Thomas Mielke  
4      143<sup>rd</sup> Defendant: Mark Miloscia  
5      144<sup>th</sup> Defendant: Jim Moeller  
6      145<sup>th</sup> Defendant: Dawn Morrell  
7      146<sup>th</sup> Defendant: Jeff Morris  
8      147<sup>th</sup> Defendant: Edward Murray  
9      148<sup>th</sup> Defendant: Daniel Newhouse  
10     149<sup>th</sup> Defendant: Toby Nixon  
11     150<sup>th</sup> Defendant: Al O'Brien  
12     151<sup>st</sup> Defendant: Ed Orcutt  
13     152<sup>nd</sup> Defendant: Kirk Pearson  
14     153<sup>rd</sup> Defendant: Eric Pettigrew  
15     154<sup>th</sup> Defendant: Cheryl Pflug  
16     155<sup>th</sup> Defendant: Skip Priest  
17     156<sup>th</sup> Defendant: David Quall  
18     157<sup>th</sup> Defendant: Dan Roach  
19     158<sup>th</sup> Defendant: Phil Rockefeller  
20     159<sup>th</sup> Defendant: Sandra Singery Romero  
21     160<sup>th</sup> Defendant: Laura Ruderman

1      161<sup>st</sup> Defendant: Sharon Tomiko Santos  
2      162<sup>nd</sup> Defendant: Lynn Schindler  
3      163<sup>rd</sup> Defendant: Mark Schoesler  
4      164<sup>th</sup> Defendant: Shay Schual-Berke  
5      165<sup>th</sup> Defendant: Barry Sehlin  
6      166<sup>th</sup> Defendant: Jan Shabron  
7      167<sup>th</sup> Defendant: Geoff Simpson  
8      168<sup>th</sup> Defendant: Mary Skinner  
9      169<sup>th</sup> Defendant: Helen Sommers  
10     170<sup>th</sup> Defendant: Brian Sullivan  
11     171<sup>st</sup> Defendant: Bob Sump  
12     172<sup>nd</sup> Defendant: Gigi Talcott  
13     173<sup>rd</sup> Defendant: Rodney Tom  
14     174<sup>th</sup> Defendant: Dave Upthegrove  
15     175<sup>th</sup> Defendant: Velma Veloria  
16     176<sup>th</sup> Defendant: Deb Wallace  
17     177<sup>th</sup> Defendant: Alex Wood  
18     178<sup>th</sup> Defendant: Beverly Woods

19     **Washington State Executive Ethics Board**

20     **Address: 2425 Bristol Court SW, PO Box 40149, Olympia, WA. 98504**

21     179<sup>th</sup> Defendant: James Vaché  
22     180<sup>th</sup> Defendant: Marilee Scarbrough  
23     181<sup>st</sup> Defendant: Laquita Fields  
24     182<sup>nd</sup> Defendant: Paul Zellinski  
1      183<sup>rd</sup> Defendant: Trish Akana  
2      184<sup>th</sup> Defendant: Brian Malarky

3      **Washington State Legislative Ethics Board**

4      **Address: Washington State Capitol, PO Box 40482, Olympia, WA. 98504**

5      185<sup>th</sup> Defendant: Paul Aldinger  
6      186<sup>th</sup> Defendant: James Anderson  
7      187<sup>th</sup> Defendant: William Asbury  
8      188<sup>th</sup> Defendant: John Betrozoff  
9      189<sup>th</sup> Defendant: Ruth Schroeder  
10     190<sup>th</sup> Defendant: Mike O'Connell

11     **Pierce County Councilors**

12     **Address: Pierce County Council, 930 Tacoma Ave S, Tacoma, WA. 98402**

13     191<sup>st</sup> Defendant: Shaun Bunney  
14     192<sup>nd</sup> Defendant: Paul Bocchi  
15     193<sup>rd</sup> Defendant: Barbara Gelman  
16     194<sup>th</sup> Defendant: Calvin Goings  
17     195<sup>th</sup> Defendant: John Ladenburg, Executive Officer  
18     196<sup>th</sup> Defendant: Terry Lee

1      197<sup>th</sup> Defendant: Harold Moss  
2      198<sup>th</sup> Defendant: Kevin Wimsett

3      **Tacoma City Councilors**

4      **Address: Tacoma City Council, 747 Market St., Suite 1200, Tacoma, WA. 98402**

5      199<sup>th</sup> Defendant: Bill Baarsma, Mayor  
6      200<sup>th</sup> Defendant: Bill Evans  
7      201<sup>st</sup> Defendant: Connie Ladenburg  
8      202<sup>nd</sup> Defendant: Mike Lonergan  
9      203<sup>rd</sup> Defendant: Sharon McGavick  
10     204<sup>th</sup> Defendant: Doug Millar  
11     205<sup>th</sup> Defendant: Bil Moss  
12     206<sup>th</sup> Defendant: Kevin Phelps  
13     207<sup>th</sup> Defendant: Rick Talbert

14     **Washington State Patrol**

15     **Address: General Administration Building, PO Box 42600, Olympia, WA. 98504**

16     208<sup>th</sup> Defendant: Ronal Serpas, Chief  
17     209<sup>th</sup> Defendant: Lt. Davis  
18     210<sup>th</sup> Defendant: Sergeant Dahl  
19     211<sup>th</sup> Defendant: Joe Olson

20     **Pierce County Sheriff's Department**

21     **Address: 930 Tacoma Ave S, Tacoma, WA. 98402**

22     212<sup>th</sup> Defendant: Paul Pastor, Sheriff  
23     213<sup>th</sup> Defendant: Graig Adams  
24     214<sup>th</sup> Defendant: Deputy Brame

25     **City of Tacoma Police Department**

26     **Address: 930 Tacoma Ave S, Tacoma, WA. 98402**

27     215<sup>th</sup> Defendant: Catherine Woodard, Deputy Chief of Police

28     **City of Gig Harbor Police Department**

29     216<sup>th</sup> Defendant: Mitch Barker, Chief of Police

30     217<sup>th</sup> Defendant: Officer Entze

31     **Pierce County Prosecutors Office**

32     **Address: 930 Tacoma Ave S, Tacoma, WA. 98402**

33     218<sup>th</sup> Defendant: Gerald Horne, Chief Prosecuting Attorney

34     219<sup>th</sup> Defendant: Gerald Costello, Prosecuting Attorney

35     **United States Department of Justice, Seattle**

36     **Address: 601 Union St., Suite 5100, Seattle, WA. 98101**

37     220<sup>th</sup> Defendant: John McKay, US Attorney

38     221<sup>st</sup> Defendant: Donald Currie, Assistant US Attorney

1      **FBI, Seattle**

2      **Address: 1110 Third Ave, Seattle, WA. 98101**

3      222<sup>nd</sup> Defendant: Charles Mandigo, Special Agent in Charge

4      223<sup>rd</sup> Defendant: Danny Barkley, Supervisory Special Agent

5      224<sup>th</sup> Defendant: (Unnamed female) Special Agent on Duty, 3:30pm, March 5, 2003

6      **United States Department of Justice, Washington DC**

7      **Address: U.S. Department of Justice, Washington DC, 20530**

8      225<sup>th</sup> Defendant: Ralph Boyd, Jr. - Assistant United States Attorney General

9      226<sup>th</sup> Defendant: Albert Moskowitz - Chief, Criminal Section, Civil Rights Division

10     227<sup>th</sup> Defendant: Ysmael Fonseca - Paralegal Specialist, Criminal Section.

11     228<sup>th</sup> Defendant: Norman Hillman - Chief, Public Integrity Section.

12     229<sup>th</sup> Defendant: Lisa Frank, Supervisory Litigation Support Specialist, Public Integrity Section

13     **Washington State Attorney General's Office**

14     **Address: 1125 Washington St. SE, PO Box 40100, Olympia, WA. 98504**

15     230<sup>th</sup> Defendant: Jeffrey Goltz, Deputy Attorney General

16     **III. JURIDICTION, VENUE, AND EXTERNAL JUDGES**

17     ***Jurisdiction***

18     5. The United States District Court for the Western District of Washington has original  
19     jurisdiction of all civil actions arising under the laws of the United States, and therefore  
20     this court has jurisdiction over plaintiff's claim, under 28 USC § 1331. This Court has  
21     further original jurisdiction pursuant to 28 USC § 1331 as an aspect of this case is in the  
22     nature of mandamus to compel an officer of the United States to perform a duty owed  
23     to the Plaintiff.

24     6. This Court has supplemental jurisdiction over the Plaintiff's state law claim under 28  
25     USC § 1337.

26     ***Venue***

27     7. Venue properly lies in this court pursuant to 28 USC § 1331 (e), BECAUSE (1) a  
28     substantial part of the events or omissions, giving rise to the claim, occurred in this

district, and (2) a substantial part of property that is the subject of the action is situated in this district, and (3) most of the Defendants reside in this judicial district, and (4) the Plaintiff resides in this judicial district.

### *Request for External Judges*

8. Due to the nature and complexity of the case, Plaintiff requests that a special panel of three judges from outside the state be convened to preside over the case. Amongst the Defendants to this case are ten judges from Washington State, including the Chief Justice. Also included amongst the Defendants are the Governor, the Attorney General, the Secretary of State, and other senior members of the Washington State Government. Rationally, an impartial and fair hearing cannot be expected from a local judge.

#### IV. PROSE

9. Illegally deprived of his assets and a large portion of his income by the very people defending this case, the Plaintiff is unable to afford those bright legal minds who might navigate the peculiar legal convention and the maize of rules and conflicting laws in order to claim restitution for his losses. Despite that very effective method to deny a citizen justice, the conduct of the Defendants in violating the accepted common law norms of society and thereby causing the Plaintiff harm and loss is not only morally wrong but also legally indefensible, and must not be allowed to go unpunished without restitution.
10. The Plaintiff thus proceeds pro se in this case guided by the principles enshrined in the Constitution and by an inner sense of what is morally right and wrong - guided by those very values which every American would like to see their fellow citizens live by.

1  
2                   V. BACKGROUND, FACTS, EVENTS.  
3  
4

5                   *Milieu*  
6  
7

8                   11. The founding fathers of America have enshrined noble principles in the Constitution of  
9                   the United States – principles of freedom, justice, and the protection of individual  
10                  rights. Legislators have translated these principles into some admirable laws. Yet,  
11                  other laws leave much to be desired. The entanglement of conflicting laws provides  
12                  judges with no clear guidance or parameters. Thus judges have carte-blanche to  
13                  miscreate. It is in the area of the administration of the laws that something has gone  
14                  dreadfully awry.  
15

16                  12. Two sets of standards have developed in the execution of the laws – one set of  
17                  standards is applicable to the general populace, the other applicable to those in  
18                  authority. Officials in positions of authority who abuse their positions and the law may  
19                  generally do so with impunity. This has become the norm and there is no effective  
20                  antidote available to the general population. The administrative system and certain laws  
21                  in fact protect such abusers from accountability. This further encourages immoral and  
22                  corrupt behavior amongst officials.  
23

24                  13. There are enormous obstacles in the path of the common man who aims to bring an  
25                  official to justice for misconduct or crimes committed. Every member of the public,  
26                  who has attempted that, can attest thereto. Officials who are tasked with administering  
27                  the laws will simply fail to take action against offenders in their midst. This is by far  
28                  the most effective method to protect a delinquent peer. This collusion amongst  
29                  officialdom to protect their own from criminal accountability is widespread throughout  
30                  all branches of government: executive, legislative, and law enforcement/judiciary.  
31                  This profound malevolence permeates through every level of government: city, county,  
32                  state, and federal.  
33

14. The Plaintiff in this case was illegally stripped of his property by an errant judge acting in collusion with two others. For three years the Plaintiff has attempted to retrieve his property, and attempted to bring the perpetrators of the crimes to book. In his efforts, the Plaintiff made nine hundred and twenty (920) individual written requests to three hundred and three (303) officials from the most junior police officer to the highest authorities in the land. Plaintiff's efforts met with callous indifference. The cover up of crimes committed by officials is absolute. In practice, government officers are unassailable.

15. The lofty principles established by the Constitution have been usurped by those in present day government with lesser and darker intentions. The pernicious effect of this callous abuse has a harsh impact upon society. The United States of today is not the benign society which the founding fathers aspired to create through the higher values enshrined in the Constitution.

### *Facts / Events*

### *Initiating Cause*

16. On January 4, 2002, and on July 17, 2002, a judge presiding over a marital dissolution in Washington State Superior Court Case # 00-3-02932-I, colluded with two others and fraudulently and illegally seized virtually all the Plaintiff's assets and a substantial portion of his future income. Amongst the crimes associated with that illegality were 245 counts of perjury, 12 counts of fraud, burglary, theft, and tampering with court evidence.

17. The marriage was childless and it was dissolved on the premise of 'no-fault'. However, the judge entered the court with premeditated intent to favor the woman, regardless of fact, regardless of evidence, and regardless of law. In flagrant violation of agreements, contracts, and law, the judge effectively allocated 100% of the estate to the wife. In

1 addition, the judge awarded the Plaintiff's entire (401K) pension to the wife. The judge  
2 also awarded the wife a substantial portion of his income as maintenance, for the  
3 remainder of Plaintiff's working career. This order was made despite the fact that both  
4 parties were able-bodied and adequately qualified to work. In her judgment, the judge  
violated 36 statutes.

5 *Seeking Rectification*

6 18. In order to seek rectification and justice, the Plaintiff lodged criminal charges against  
7 the perpetrators of the crimes with police and prosecutors in Washington State so as to  
8 enforce the laws of the state, reverse the illegal state action, and to recover property  
9 unlawfully seized by the judge. *Prima Facie* evidence of the crimes was provided to  
each authority. However, officers from these authorities omitted to perform their legal  
duties to investigate and prosecute the crimes committed by the judge and two others,  
and instead embarked upon a conspiracy to protect the criminals.

12 19. Further requests were made to officers of other government institutions and agencies to  
13 enforce the laws and retrieve the Plaintiff's assets which were illegally seized. Officer  
14 upon officer and authority upon authority failed to perform the duties required of them  
15 by law. Rather, they elected to protect the judge and the malfeasant officers involved,  
16 and elected to cover up the crimes.

17 *Exhaustive Measures*

18 20. The Plaintiff took exhaustive measures to seek justice and restitution and to animate the  
19 law enforcement process, but to no avail. Three hundred and three (303) officers, who  
20 held pertinent positions in Washington State and Federal governments, were  
21 approached by the Plaintiff for assistance. Amongst them are high officials of state and  
federal government, including the Washington State Governor, the Attorney General,  
the Secretary of State, the Chief Justice, and four (4) police chiefs. Amongst federal  
23 officials are FBI agents, a US Attorney, an Assistant Attorney General of the United  
24 States, and other senior officials.

1       21. The Plaintiff made nine hundred and twenty (920) individual written requests to  
2       officials from thirty two (32) different institutions of government to enforce the laws  
3       (See Appendix 2). These institutions include State and Federal Executive Offices, State  
4       and Federal Attorney General Offices, State and Federal Legislatures, State and Federal  
5       Judiciary Committees, four police departments, and the FBI.  
6  
7       22. The two hundred and thirty (230) Defendants in this case were amongst the officials  
8       approached by the Plaintiff to address the crimes and to retrieve illegally seized assets.  
9       Hundreds of requests were made to the Defendants. Information was provided to the  
10      Defendants in a "Dossier of Crimes" which meticulously details and provides *prima  
facie* evidence of the crimes. Alternatively, the Defendants were advised where such a  
11      dossier was available for their use.  
12  
13      23. Each one of the Defendants held a special position of trust in society and a pertinent  
14      position in government to deal with violations of law. Each Defendant had a statutory  
15      duty, a common law duty and a moral duty to adhere to the request by the Plaintiff to  
16      address the crimes. Each one of the Defendants failed to perform their legal and moral  
17      duties. However, providing protection to criminals is a crime. Failure to have them  
18      identified is a crime.  
19  
20      24. Criminal charges were filed against Defendants for failure to investigate and prosecute,  
21      or alternatively to initiate the investigations and prosecutions of the crimes presented to  
22      them. However, Defendants' crimes were not investigated or prosecuted either.

23                  *Conspiracy to commit crimes*

24      25. To a large degree, group activity enhances the successful outcome of criminal  
endeavor. The hierarchical structure of government and law enforcement should  
normally take care of any individual offence or failure of duty in its ranks. Any  
criminal act or omission by an individual Defendant would in itself not have grave  
consequences. However, the collective criminal actions by Defendants defeated the

1 ends of justice in its entirety.

2  
3 26. In this case, one Defendant performed one part of the act; another performed the other  
4 part of the act, and a mutually protective barrier was set up around the Defendants  
5 which covered up any criminal wrongdoing amongst themselves. The incestuous  
6 relationship of the entire group of offenders served to complete the closed loop of  
7 reciprocal protection against the consequences of their crimes, to the total negation of  
8 their statutory obligations.

9  
10 27. Each Defendant combined with all the other Defendants to further the aims of the group  
11 to commit offences and to obstruct justice. This collusion by Defendants to defeat the  
12 course of justice ran throughout the very 'government function' which was called upon  
13 to deal with the crimes, and as a consequence the Defendants became part of the wider  
14 conspiracy to cover up the crimes.

15  
16 28. Accordingly, criminal charges of conspiracy were filed against all the Defendants. In  
17 terms of the criminal statute 18 USC § 371 and 18 USC § 3, each principal offender is  
18 also a co-conspirator and an accessory to the crimes of the other conspirators. In this  
19 way the crimes proliferated and a staggering *1.6 million crimes* committed by officials  
20 of Washington State and the Federal Government have to date been documented and  
21 lodged in this case.

22  
23 29. Despite numerous requests to officials in pertinent positions of authority and decision-  
24 making, not one has acted on the allegations of 1.6 million crimes. Not one has acted  
25 to provide the Plaintiff the protection of the law, or acted to recover illegally seized  
26 assets. To date, the crimes and the major criminal conspiracy in government continue  
27 unabated, without being investigated or prosecuted.

28  
29 30. The crimes associated with this criminal conspiracy are of a serious nature and include,  
30 amongst others, the following: Failure of Duty (RCW 42.20.100); Official Misconduct

1 (RCW 9A.80.010); **Rendering Criminal Assistance** (RCW 9A.76.050); Violation of  
2 RCW 2.28.030 as Accomplices; 514,374 counts of Conspiracy against Rights (18 USC  
3 § 241); 514,374 counts of Conspiracy to Commit Offense (18 USC § 371); Deprivation  
4 of Rights under color of law (18 USC § 242); 53,900 counts of Misprision of Felony  
5 (18 USC § 4); 514,374 counts of Accessory after the Fact (18 USC § 3); Obstruction of  
Justice (18 USC § 1505); Tampering with Court Evidence (RCW 9A.72.150).

6 31. For a list of the obvious laws violated by the conspirators, see **Appendix 1**.

7 32. By joining a conspiracy against the very values and principles of 'Justice', 'Freedom',  
8 and 'the Rights of the Individual' enshrined in the Constitution, the Defendants bring  
9 the entire nation into disrepute amongst the 'family of civilized nations' and should be  
10 held accountable for their misdeeds.

11 *Obligation to report crimes*

12 33. Two sources of law obligate the Defendants to deal with felonies and other crimes  
13 which have been brought to their attention. Firstly, the law on Misprision of Felony  
14 requires that: "whoever, having knowledge of the actual commission of a felony  
15 cognizable by a court of the United States, conceals and does not as soon as possible  
16 make known the same to some judge or other person in civil or military authority under  
17 the United States" is guilty of Misprision of Felony. (18 USC § 4).

18 34. Secondly, there is an imperative in society which dictates that if you have knowledge of  
19 the actual commission of a crime committed against a fellow human being, you are  
20 morally obliged to assist him, or make the crime known to somebody who can assist  
21 him. Every citizen has that moral obligation. That is a common law responsibility in  
22 order to secure a benevolent society. The legislators placed so much importance on this  
23 common law principle that they incorporated it into the statutes. (18 USC § 4 -  
discussed above).

35. The Defendants have, in flagrant disregard for both the statutes and common law violated their obligations. The Defendants did not act upon their knowledge of felonies and other crimes and upon their knowledge that those crimes have caused the Plaintiff harm and loss. They should either have investigated or prosecuted (or initiated same), or alternatively, they should have passed the information on to somebody in authority who would have addressed the crimes. Each Defendant had the capacity to act. Each Defendant failed to act.

### *Violation of Constitutional Rights*

36. Every citizen living in the United States has by law the following two inalienable rights - that of lawful ownership of property, and that of equal protection of the laws, viz.: US Constitution - Amendment XIV, Section 1: "... nor shall any state deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws". This avowal is echoed by the Washington State Constitution, Section 3 - Personal Rights: "No person shall be deprived of life, liberty, or property, without due process of law".

37. As officers of the Washington State and/or Federal governments, the Defendants, both as individuals and collectively as conspirators: denied the Plaintiff equal protection of the laws; denied the Plaintiff due process of law; and were accessories to the deprivation of the Plaintiff's property without the due process of law.

### *Plaintiff's loss*

38. As a direct result of the malfeasance of the two hundred and thirty (230) Defendants in this case, the Plaintiff suffered the loss of his assets and future income to the value of \$376, 865. One purpose of this action is to recover losses incurred through the malfeasance of the Defendants.

### *Action to Compel*

39. There is in society today a parcel of 1.6 million allegations of crimes which the

authorities have willfully failed to address. As the crimes were committed by officials, there is little or no chance that these crimes will be addressed by the authorities (the facts to be revealed by this case will prove this statement).

40. Each of the government officials listed in this complaint as a Defendant was at various stages provided access to a dossier describing the crimes. The 1017 -page "Dossier of Crimes" contains meticulous details and prima facie evidence of the criminal allegations. Each Defendant had a duty to investigate and/or prosecute, or to initiate same, but each Defendant failed. Yet, the social order cannot tolerate such lawlessness.

41. Accordingly, the Plaintiff will petition this Court for a mandamus to compel each Defendant to deal with the particular parcel of criminal allegations placed before him/her, each according to his own statutory duties.

## **Summary**

42. The Plaintiff was stripped of virtually all of his property through criminal acts committed by a judge and two others. The Plaintiff requested the Defendants to administer their statutory and common law duties to bring the perpetrators to book in order to recover his assets. The Defendants willfully withheld their specific function and key role in the administration of the law, thereby denying the Plaintiff the protection of the law and 'due process', and causing him harm and loss of \$376,865. Through this action the Plaintiff is seeking: to recover his loss in damages; to impose punitive measures upon the Defendants as a deterrent to other malfeasant officers; and to petition the Court to compel delinquent servants of the people to perform their duty to the people obligated by law.

43. This trial will disclose the cover-up of innumerable criminal acts involving two hundred and thirty (230) officials of government - from the most junior police officers, through their police chiefs, to prosecutors, judges, state executives, legislators, and

1                   ultimately, to the top echelons of the Department of Justice and the Government of the  
2                   United States. The facts of this case will demonstrate the endemic corruption in the  
3                   administration of justice in the United States, and the large-scale cover-up of crime and  
4                   the protection by officials of their own. The criminality embroils the very people whose  
5                   function it is to see to, and/or oversee, the administration of justice.

6                   44. Yet, the corruption disclosed is not unique to this case. It is merely a reflection of the  
7                   trauma that plays out in the United States courts day after day, year after year, court  
8                   upon court, state upon state, and administration upon administration. The rot in the  
9                   system laid bare by this case will point to a cataclysmic failure in the execution of  
10                  justice and governance. This particular brand of tyranny engenders a violent impact  
11                  upon society – the violence by government upon its own people.

## 11                   **CAUSES OF ACTION**

### 13                   **VI. FIRST CAUSE OF ACTION**

#### 14                   **Violation of Common Law Duty**

15                  45. The Plaintiff re-alleges paragraphs 1 through 44 as if fully set forth herein.

16                  46. Every member of society, without exception, has a moral obligation to all other  
17                  members of society not to cause anybody harm or loss. There is no class of people in  
18                  society who are exempt from this basic tenet of society.

19                  47. Every member of society, without exception, has a moral obligation to all other  
20                  members of society to live by the norms of society. In Washington State, for instance,  
21                  those norms are obligated in the United States Constitution; the Washington State  
22                  Constitution; Federal law; Washington State law; Common Law, and other laws.

23                  48. The laws serve to govern the moral behavior of society, and serve to bring about a  
24                  benign and civil society. Thus there is a moral duty as well as a legal duty upon all in

1 society, including the Defendant(s), not breach any rules or laws of society which act or  
2 omission may cause another, including the Plaintiff, harm or loss.

3 49. Like any other citizen of Washington State and the United States of America, the  
4 Plaintiff, has the right to live and function in that orderly and civilized society created  
5 by the rules and laws of society. The Plaintiff has a right to enjoy all the benefits  
6 which those rules and laws provide. In short, the Plaintiff has the *right* to the protection  
7 of the law. The Plaintiff has a right that others in society, including the Defendant(s),  
8 do not breach any laws which may impinge upon his rights and cause him harm and  
9 loss. The Defendant(s) conversely owed the Plaintiff a legal duty to obey the laws – a  
10 legal duty not to breach any laws which may impinge upon the Plaintiff and cause him  
11 harm and loss.

12 50. The Defendant(s) has in conscious, willful, and malicious violation of his/her common  
13 law duties to the Plaintiff engaged in conduct which caused, and continues to cause, the  
14 Plaintiff harm and loss. That conduct included, but is not limited to the following:  
15 maliciously and willfully conspiring with others against the rights of the Plaintiff;  
16 conspiring with others to commit violations of law; assisting criminals who had  
17 committed crimes to evade accountability; obstructing the natural course of justice;  
18 failing their statutory duties and other acts which may have brought the Plaintiff succor.  
19 These acts may further be surmised by considering the common law duties which  
20 underlie the criminal violations committed by the Defendant(s) and listed in Appendix  
21 I.

22 51. The Defendant(s) knew, or reasonably should have known, that the Plaintiff would  
23 suffer harm and loss should the Defendant(s) breach his/her common law duties  
24 towards the Plaintiff.

25 52. By reason of the Defendant(s)' conscious, willful, and malicious conduct in violation of  
26 his/her legal duties, the Plaintiff has suffered and continues to suffer harm and loss.

1  
2                   **VII. SECOND CAUSE OF ACTION**  
3

4                   **Breach of special position of trust**  
5                   **Breach of special duty**

6                   53. The Plaintiff re-alleges paragraphs 1 through 44 as if fully set forth herein.  
7  
8                   54. By virtue of their professional or official positions, certain people in the community  
9                   such as doctors, priests or mayors, assume a particular status in society. Their status  
10                  encumbers upon such people a special duty of trust towards society.  
11  
12                  55. By taking on his/her particular position in government, the Defendant(s) in this case  
13                  also assumed a special status in society, and consequently they also assumed a special  
14                  duty towards society associated with that status. The Defendant(s) assumed a special  
15                  duty commensurate with the particular nature of his/her status in society. For example,  
16                  the common law duty of a judge differs to that of a junior policeman. Nevertheless,  
17                  amongst other special duties, the Defendant(s) has a self-assumed duty to maintain and  
18                  advance an orderly, civil and benevolent society. That is the innate nature of his/her  
19                  work and of the mantle of 'higher esteem' assumed in society – that special position of  
20                  trust.  
21  
22                  56. The Plaintiff had a right to rely on the Defendant(s) self-assumed special duty.  
23                  Defendant(s) failed to exercise reasonable care in the performance of his/her duty.  
24                  When faced with overwhelming lawlessness, Defendant(s) failed to act commensurate  
25                  with his/her position of 'high esteem' in society and with his/her special duty. Further,  
26                  Defendant(s) suppressed information that would have assisted others to maintain and  
27                  advance lawfulness and civility in the community.  
28  
29                  57. The Defendant(s) continuing conduct constitutes an intentional breach of his/her special  
30                  position of trust and his/her special duty to society, including the Plaintiff.

58. The Defendant(s) knew, or reasonably should have known, that the Plaintiff would suffer harm and loss should the Defendant(s) breach his/her common law duties towards the Plaintiff.

59. As a direct and proximate cause of Defendant(s)' breach, the Plaintiff has suffered, and continues to suffer, harm and loss.

## VIII. THIRD CAUSE OF ACTION

**Violation of Common Law duties regarding the reporting, and/or acting upon, harmful acts visited upon others (Common Law equivalent of Misprision of Felony)**

60. The Plaintiff re-alleges paragraphs 1 through 44 as if fully set forth herein.

61. Neglecting your duty as a human being is morally wrong.

62. Should you have knowledge of the actual commission of a crime committed against a fellow human being, you are *morally obliged* to assist him, or make the crime known to somebody who can assist him. This principle is well entrenched in our common law.

63. In fact, legislators have considered this notion such an important principle of civil society that they have termed its neglect a crime. Failing to report a crime to an authority who will address that crime is termed ‘Misprision of Felony’ in the statutes. Upon serious contemplation by our legislators, the law was enacted for a very sound reason, which is to bring civility into our society.

64. The Plaintiff made known to the Defendant(s) the fact that criminal and harmful acts had been committed against him and requested assistance. The Plaintiff provided the Defendant(s) with details and with prima facie evidence of the criminal and harmful acts, or advised the Defendant(s) where that detail and evidence was available for his/her information and action.

65. The Defendant(s) owes the Plaintiff a legal duty not to act unlawfully and violate common law which violation would cause the Plaintiff harm and loss. The Defendant(s) owes the Plaintiff a duty to report or act upon criminal acts committed against the Plaintiff. More so when the Defendant(s) holds a special position of trust in society, and consequently possesses far greater capacity for harm than the ordinary citizen. The Plaintiff had a right to rely on that legal duty.

66. With reckless disregard for his/her legal duties towards the Plaintiff regarding the reporting of criminal acts visited upon others, (and his/her legal duties to the state in terms of 18USC 4), the Defendant(s) failed to take reasonable and prompt action upon the information provided to him/her. Further, Defendant(s) suppressed information that would have assisted others to maintain and advance lawfulness and civility in the community. By his/her conduct, the Defendant(s) violated his common law duty to the Plaintiff.

67. The Defendant(s) knew, or reasonably should have known, that the Plaintiff would suffer harm and loss should the Defendant(s) omit to execute his/her legal duties.

68. By reason of the Defendant(s)' conscious, willful, and malicious conduct in violation of his/her common law duties, the Plaintiff has suffered and continues to suffer harm and loss.

## **IX. FOURTH CAUSE OF ACTION**

## **Violation of 18 USC 4 - Misprision of Felony**

69. Plaintiff re-alleges paragraphs 1 through 44 as if fully set forth herein.

70. Pursuant to 18 USC 4 of US Code, it is a crime to have "knowledge of the actual commission of a felony cognizable by a court of the United States and conceal it, and not to make it known as soon as possible to some judge or other person in civil or

1 military authority under the United States", and who by implication will act upon the  
2 crimes.

3 71. The Plaintiff brought to the attention of the Defendant(s) the fact that felonies had been  
4 committed and that these felonies had neither been investigated nor prosecuted.

5 72. The Plaintiff requested the Defendant(s) to take action regarding these felonies. The  
6 Plaintiff provided the Defendant(s) with prima facie evidence of the felonies or advised  
7 the Defendant(s) where that evidence was available for his/her information and action.

8 73. The Plaintiff has a right and the Defendant(s) owes the Plaintiff and the state a legal  
9 duty not to act unlawfully and violate 18USC 4, which violation would cause the  
10 Plaintiff harm and loss.

11 74. With reckless disregard for his/her legal duties towards the Plaintiff and his/her legal  
12 duties to the state in terms of 18USC 4, the Defendant(s) failed to take reasonable and  
13 prompt action. By his/her conduct, the Defendant(s) has violated 18 USC 4, common  
14 law, and other laws.

15 75. The Defendant(s) knew, or reasonably should have known, that the Plaintiff would  
16 suffer harm and loss should the Defendant(s) omit to execute his/her legal duties in  
17 terms of 18 USC 4.

18 76. By reason of the Defendant(s)' conscious, willful, and malicious conduct in violation of  
19 his/her legal duties, the Plaintiff has suffered and continues to suffer harm and loss.

21 **X. FIFTH CAUSE OF ACTION**

22 **Violation of Common Law duties regarding collusion and conspiracy**

23 77. Plaintiff re-alleges paragraphs 1 through 44 as if fully set forth here in.

1           78. Neglecting your duty as a human being is morally wrong.

2           79. All in society have a duty *not* to combine with others to cause someone harm and loss.

3           It is wrong to cause another the loss of rights and privileges which are common in  
4           society. In fact, legislators have considered this notion so imperative, that they have  
5           termed such an act a crime and have legislated against it. Title 18 USC 241 states that  
6           it is a crime "for two or more persons to conspire to oppress any person in any State in  
7           the free exercise or enjoyment of any right or privilege secured to him by the  
8           Constitution or laws of the United States".

9           80. The Plaintiff brought to the attention of the Defendant(s) circumstances in which  
10          numerous parties conspired to commit crimes, which crimes would cause the Plaintiff  
11          harm and loss and deprivation of rights and privileges commonly enjoyed by all in  
12          society. The Defendant(s) was advised that although allegations of a conspiracy  
13          involving many officials of government had previously been lodged with law  
14          enforcement authorities, no action had been taken by the authorities and the collusion  
15          and the loss of rights and privileges continued. The information provided to the  
16          Defendant(s) also pointed to a grand failure of the legal system to prevent the harm, and  
17          pointed to an illegal cover up of a large number of criminal violations by officials. The  
18          Plaintiff provided the Defendant(s) with substantial *prima facie* evidence of the  
19          conspiracy or advised the Defendant(s) where such evidence was lodged, available for  
20          his/her information.

21           81. Officers of state hold a special position of trust in society and this is recognized in law,  
22          for example in Washington State law RCW 900. By way of his/her official position,  
23          the Defendant(s) holds a special position of trust in society and a special duty towards  
24          all in society, including the Plaintiff. The Plaintiff requested assistance from the  
25          Defendant(s) to halt the inequities described in a dossier of crimes.

26           82. Instead of taking reasonable, prompt and adequate remedial action, the Defendant(s),

1           with reckless disregard, omitted to take the action demanded by his special duty. This  
2           omission furthered the aims of the conspiracy, provided protection to the conspirators,  
3           and rendered the Defendant(s) culpable as a co-conspirator to commit crimes against  
4           the Plaintiff. Some of the laws violated in the conspiracy are listed in Appendix 1.

5           83. The Plaintiff has a right and the Defendant(s) owes the Plaintiff a common law duty not  
6           to conspire with others to commit crimes which conspiracy would cause the Plaintiff  
7           harm and loss.

8           84. The Defendant(s) knew, or reasonably should have known, that conspiring with others  
9           to commit crimes would result in the Plaintiff suffering harm and loss.

10          85. As a direct and proximate result of the Defendant(s)' unlawful and reckless conduct,  
11           Plaintiff has suffered, and continues to suffer harm and loss.

12           **XI. SIXTH CAUSE OF ACTION**

13           **Violation of 18 USC § 371**

14          86. Plaintiff re-alleges paragraphs 1 through 44 as if fully set forth here in.

16          87. Neglecting your duty as a human being is morally wrong.

18          88. It is encumbered upon us by society not to gang-up and cause someone harm and loss.  
19           In fact, legislators have considered this notion so imperative, that they have termed  
20           such act a crime and have legislated against it.

21          89. Title 18 USC 371 states in relevant part: "If two or more persons conspire either to  
22           commit any offense against the United States" "and one or more such persons do any  
23           act to effect the object of the conspiracy" each is guilty of Conspiracy to Commit  
24           Offense.

1       90. The Plaintiff brought to the attention of the Defendant(s) circumstances in which  
2       numerous parties conspired to commit offences. The Defendant(s) was advised that  
3       although allegations of a conspiracy involving many officials of government had  
4       previously been lodged with law enforcement authorities, these allegations had not  
5       been investigated or prosecuted. The information provided the Defendant(s) also  
6       pointed to a grand failure of the legal system pertaining to this case, and to an illegal  
7       cover up of a large number of criminal violations by officials.

8       91. The Plaintiff requested the Defendant(s) to take care that the laws be faithfully  
9       executed, and that the allegations of conspiracy be investigated and prosecuted. The  
10      Plaintiff provided the Defendant(s) with substantial *prima facie* evidence of the  
11      conspiracy or advised the Defendant(s) where such evidence was lodged, available for  
12      his/her information.

13      92. Instead of taking reasonable, prompt and adequate remedial action, the Defendant(s),  
14      with reckless disregard, omitted to take the action demanded by his position. This act  
15      (omission) furthered the aims of the conspiracy, provided protection to the conspirators,  
16      and rendered the Defendant(s) culpable as a co-conspirator to commit offences and a  
17      co-conspirator against Plaintiff's rights, thereby breaching 18 USC § 371. Some of the  
18      laws violated in the conspiracy are listed in Appendix 1.

19      93. The Plaintiff has a right and the Defendant(s) owes the Plaintiff a legal duty not to act  
20      unlawfully and violate 18USC 371, which violation would cause the Plaintiff harm and  
21      loss.

22      94. The Defendant(s) knew, or reasonably should have known, that violating 18 USC § 371  
23      and conspiring with others to oppress the Plaintiff's rights under these circumstances,  
24      would result in the Plaintiff suffering harm and loss.

25      95. As a result of the Defendant(s)' unlawful and reckless conduct, Plaintiff has suffered,

1 and continues to suffer, harm and loss.

2  
3                   **XII. SEVENTH CAUSE OF ACTION**

4                   **The Cause of the 'Action to Compel'**

5 96. Plaintiff re-alleges paragraphs 1 through 44 as if fully set forth here in.

6 97. The Cause of the 'Action to Compel' is the failure of duty by 230 government officers.

7                   **XIII. DAMAGES**

8                   *Damages for loss of assets*

9 98. As a result of the Defendant(s)' wrongful and unlawful conduct, the Defendant(s) has  
10 caused the Plaintiff to suffer damages as follows:

11 99. The loss of assets and income in the amount of \$376 865 – representing the value of  
12 assets and income which were fraudulently extracted from the Plaintiff arising out of  
13 Washington State Superior Court Case # 00-3-02932-1.

14                   *Punitive damages*

15 100. The recovery of assets by way of damages may bring satisfaction to the Plaintiff –  
16 but to the Plaintiff alone. Through the payment of damages claimed above, justice will  
17 not be served. Society will retain the scourge of the rampant '*criminality with*  
*impunity*' practiced in official circles, as the laws are clearly no deterrent to delinquent  
18 officials.

20 101. In addition, it is obvious that officials will not advance criminal proceedings  
21 against another official, whatever their duties or status. Testifying to this fact are 1.6  
22 million crimes not addressed. On the contrary, it appears that the criminal process  
23 holds no deterrent value to officials at all. Moreover, the contribution of \$1600 by  
24 each Defendant to the damages claim will not affect the Defendants in any material  
way. This will also not act as a deterrent to officials.

1  
2  
3 102. Yet, in order to bring about a more benign society, it is essential that some  
4 punitive measure be taken against the Defendants for their misdeeds. Due to the  
5 seriousness of the violations of law committed by the Defendants, and due to the  
6 special position of trust and responsibility which the Defendants hold in society, the  
7 Plaintiff is further requesting the Court to award **Punitive Damages of \$1million**  
8 against each Defendant. Such punitive damages may act as a deterrent to those in  
similar positions who violate their **common law and statutory duties to society**, and who  
grossly abuse their special position of trust in society.

9  
10 103. Plaintiff is further requesting the Court to award as it sees fit **Additional Punitive**  
11 **Damages** against those specific Defendants who hold a greater status and responsibility  
12 in society, and who have, through their gross abuse and neglect of that status and  
13 responsibility, set an exceedingly poor example to all officials in lower levels of  
14 government across the country. Plaintiff is requesting the Court to award **Additional**  
15 **Punitive Damages** commensurate with those greater responsibilities and  
16 commensurate with the neglect thereof.

17  
18  
19  
20 **XIV. PRAYER FOR RELIEF**

21 WHEREFORE, the Plaintiff prays that the Court makes an order against the First through Two  
22 Hundred and Thirtieth Defendants, as follows:

23  
24 **Finding:**

1. Finding that the Defendant(s)

1.1 failed his/her common law duties and/or  
1.2 failed his/her common law duties regarding reporting of crimes and/or  
1.3 failed his/her common law duties regarding collusion and conspiracy and/or  
1.4 violated his/her special position of trust and special duty and/or

- 1.5 violated 18 USC § 4 (Misprision of Felony) and /or
- 1.6 violated 18 USC § 371 (Conspiracy to Commit Offence)

2. Finding that the Defendants are jointly and severally liable for the losses sustained by the Plaintiff of \$376 865, the one paying the other absolved.

#### Awarding:

3. Awarding Plaintiff damages for loss of assets and income in the amount of \$376,865.

4. Awarding Plaintiff punitive damages of \$1million from each of the Defendants

5. Awarding Plaintiff interest on the above amounts to the date of payment thereof

6. Awarding Plaintiff Additional Punitive Damages from each Defendant who holds/held a high level position, commensurate with:

#### **6.1 The status of that Defendant's position in society.**

6.2 The denigration of Defendant's office through the Defendant's gross abuse, omissions and willful neglect.

6.3 The disrepute which that Defendant has brought upon the United States of America and upon Washington State by joining in a conspiracy against the Civil Rights enshrined in the Constitution, which rights are so cherished by the people of the United States.

4. Awarding Plaintiff, and assess against the Defendant(s), his litigation costs, including reasonable attorneys fees, and

5. Awarding the Plaintiff such other and further relief as is just.

## **Compelling**

6. Compelling the Defendant(s) to comply with and execute his/her particular statutory duties with respect to the particular parcel of allegations of multiple crimes presented to him/her by the Plaintiff.

## **XV. DENIAL OF ORDER TO COMPEL**

Should the court deny the Plaintiff an order to compel each Defendant to comply with and

1 execute their statutory duties with respect to the allegations of multiple crimes presented to them  
2 by the Plaintiff, the *Court* is requested to deal with the allegations submitted to Court in the  
3 "Dossier of Crimes", in terms of Rule 4 of Federal Rules of Criminal Procedure and the statute  
on Misprision of Felony (18 USC 4).

4

5 Signed this 20<sup>th</sup> day of December 2004

6 

7 Anthony P. Keyter (Pro Se)

8  
9  
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## 1 Appendix 1

2 **Prima Facie evidence of violation of the laws listed below was provided to the Defendants:**

- 3 1. 14th Amendment, US Constitution
- 4 2. Article 3, Washington State Constitution
- 5 3. Conspiracy against Rights, 18 USC § 241
- 6 4. Conspiracy to commit an offense, USC 18 § 371
- 7 5. Deprivation of Rights, 18 USC § 242
- 8 6. Misprision of Felony, 18 USC § 4
- 9 7. Obstruction of Justice, 18 USC § 1505
- 10 8. Accessory after the Fact 18 USC § 3
- 11 9. Burglary - RCW 9A.52.025
- 12 10. Perjury - RCW 9.72
- 13 11. Fraud - RCW 9, 9A
- 14 12. Intent to Defraud - RCW 10.58.040
- 15 13. Theft - RCW 9A.56.030
- 16 14. Tampering with Physical Evidence - RCW 9A.72.150
- 17 15. Rendering criminal assistance - RCW 9A.76.080
- 18 16. Failure of duty by public official - RCW 42.20.100
- 19 17. Failure of judge to recuse - 2.28.030
- 20 18. Official Misconduct - RCW 9A 80.010
- 21 19. False report by public official - RCW 42.20.040
- 22 20. Oath of Office
- 23 21. Legislative Declaration - RCW 42. 52. 900
- 24 22. Perjury - RCW 9A.72
- 25 23. Perjury - Inconsistent statements -RCW 9A.72.050
- 26 24. Statements of what one does not know to be true - RCW 9A.72.080
- 27 25. False swearing - RCW 9A.72.040
- 28 26. False Representation - RCW 9.38
- 29 27. False representation concerning title - RCW 9.38.020
- 30 28. Separate property of husband - RCW 26.16.010
- 31 29. Separation contract - RCW 26.09.070
- 32 30. Unfair distribution of assets - RCW 26.09.080
- 33 31. Rights of Married Persons in General - RCW 26.16.150
- 34 32. Regarding Foreign Law - RCW5.44.050
- 35 33. International Law of Contract
- 36 34. Maintenance Orders - RCW 26.09.090
- 37 35. Payment of Costs - RCW 26.09.140
- 38 36. Changing of divorce decree after trial

## Appendix 2

Officers of government institutions listed below were approached with requests to tend to the investigation or prosecution of the crimes of this case. To date, nine hundred and twenty (920) individual requests have thus far been made to officers of these 32 pertinent institutions of government. All officers approached had a legal duty to take action upon the requests. Washington State Officers had duties in terms of Section 3 of the State Constitution and RCW 42.52.900 to act. Some pertinent laws that impose further duties upon specific officers are also listed.

1. City of Gig Harbor Police. Duties: RCW 10.93.020.1
2. City of Tacoma Police. Duties: RCW 10.93.020.1
3. Pierce County Sheriff. Duties: RCW 10.93.020.1
4. Washington State Patrol. Duties: RCW 10.93.020.1
5. FBI
6. City of Gig Harbor Prosecutor.
7. Pierce County Prosecutors.
8. Councilors of Pierce County.
9. Councilors of the City of Tacoma.
10. Washington State Executive. Duties: Office of the Governor, Lt. Governor, and Secretary of State. Duties: RCW 43.06.010
11. Washington State Attorney General: Duties: RCW 43.010.090
12. Washington State Senate.
13. Washington State Senate Judiciary Committee.
14. Washington State House of Representatives.
15. Washington State House Judiciary Committee.
16. Washington State Chief Justice.
17. Washington State Commission on Judicial Conduct. Duties: RCW 42.52.370 and RCW 2.64
18. Washington State Commission on Gender and Justice.
19. Washington State Superior Court Judges Association.
20. Washington State Bar Association
21. Washington State Legislative Ethics Committee. Duties: RCW 42.52.320
22. Washington State Executive Ethics Committee. Duties: RCW 42.52.360
23. Pierce County Ethics Committee.
24. US Attorney, Seattle. Duties: 28 USC 547
25. US Attorney, District of Columbia. Duties: 28 USC 547
26. US Department of Justice, Civil Rights Division
27. US Department of Justice, Criminal Division
28. US Senate
29. US Senate Committee on the Judiciary
30. US House of Representatives.
31. US House of Representatives Committee on the Judiciary
32. US Executive. Duties: US Constitution, Article II § 3